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6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,	)	Case No. 2:17-cr-00334-JAD-PAL
	)	
9 Plaintiff,	)	<b>STIPULATION TO CONTINUE</b>
10	)	<b>REVOCATION</b> (First Request)
11 vs.	)	
	)	
12 JUAN ANTONIO VELOZ,	)	
	)	
13 Defendant.	)	
14	)	

15 IT IS HEREBY STIPULATED AND AGREED by and between Christopher Chiou,  
16 Acting United States Attorney, by and through Allison Reese, Assistant United States Attorney,  
17 and Emily K. Strand, Esq., counsel for Defendant Juan Antonio Veloz, that the revocation in  
18 above-captioned matter be continued and rescheduled for a period of at least 7 days.

19 This Stipulation is entered into for the following reasons:

- 20
- 21 1. Defense Counsel received an offer to resolve this matter on Wednesday October
  - 22 13, 2021.
  - 23 2. The Defendant is currently incarcerated the Nevada Southern Detention Center in
  - 24 Pahrump, which requires at least 72 hour's notice before scheduling an attorney
  - 25 visit.

1           3.     Defense Counsel has a visit scheduled with Mr. Veloz on Monday October 18 at  
2                 3:00 p.m.

3           4.     Defense Counsel will not have had time to review the offer with the Defendant  
4                 prior to the currently set revocation hearing.

5           5.     Denial of this request could result in a miscarriage of justice, taking into account  
6                 the exercise of due diligence by all parties hereto.

7           6.     This is the first stipulation for a continuance sought by the parties hereto.

8  
9           Dated this 14<sup>th</sup> day of October 2021.

10                         Respectfully submitted,

11  
12           PITARO & FUMO, CHTD.

13                         OFFICE OF THE UNITED STATES ATTORNEY

14           /s/ Emily K. Strand, Esq.

14           /s/ Allison Reese, Esq.

15           Emily K. Strand, Esq.

15           Allison Reese, Esq.

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9 *Attorney for Juan Antonio Veloz*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA, ) Case No. 2:17-cr-00334-JAD-PAL  
13 )  
14 Plaintiff, )  
15 )  
16 vs. )  
17 )  
18 JUAN ANTONIO VELOZ, )  
19 )  
20 Defendant. )  
21 )  
22 )  
23 )  
24 )  
25 )

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

**FINDINGS OF FACT AND CONCLUSIONS OF LAW**

1. Defense Counsel received an offer to resolve this matter on Wednesday October 13, 2021.
2. The Defendant is currently incarcerated the Nevada Southern Detention Center in Pahrump, which requires at least 72-hours' notice before scheduling an attorney visit.
3. Defense Counsel has a visit scheduled with Mr. Veloz on Monday October 18 at 3:00 p.m.
4. Defense Counsel will not have had time to review the offer with the Defendant prior to the currently set revocation hearing.

1 5. Denial of this request could result in a miscarriage of justice, taking into account the  
2 exercise of due diligence by all parties hereto.

3 6. This is the first stipulation for a continuance sought by the parties hereto.

4 For all of the above-enumerated reasons, the ends of justice would be served by granting  
5 a continuance of the above revocation date in this matter.

6  
7 **ORDER**

8 **IT IS ORDERED** that the revocation hearing currently scheduled for October 18,  
9 2021 be vacated and continued to November 15, 2021, at 10:30 a.m.

10 Dated: October 15, 2021.

11  
12   
13 \_\_\_\_\_  
14 DISTRICT COURT JUDGE  
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